Abraham Fruchter & Twersky LLP

MEMO ENDORSED

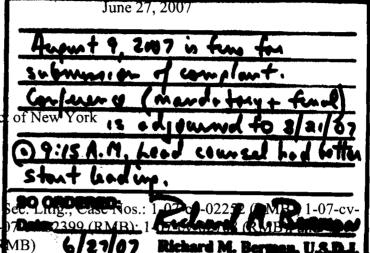
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By Hand

Honorable Richard M. Berman United States District Judge U. S. District Court, Southern Distric 500 Pearl Street Room 650 New York, N.Y. 10007

> Re: In re Worldspace 02355 (RMB); 1-1-07-cv-03109 (R



Dear Judge Berman:

We are plaintiffs' lead counsel in the above consolidated actions, and submit this letter on behalf of all parties regarding certain scheduling matters.

On May 22 and May 24, 2007, prior to the appointment of lead plaintiff and lead counsel by Your Honor, the Court entered Orders providing defendants with sixty days to respond to a consolidated complaint, but they did not provide for a date for submission of such complaint. After discussing the matter with defendants' counsel, we respectfully request that plaintiffs have forty-five days to submit a consolidated complaint or until August 9, 2007.

In addition, a status/scheduling conference has been set by the Court for Tuesday, July 3, 2007 at 10:30 a.m. Defendants inform me that they are unavailable on that date and request that such conference be adjourned. Moreover, as the Private Securities Litigation Reform Act of 1995 is applicable to this action, discovery is stayed during the pendency of defendants' likely motions to dismiss. Thus, the parties respectfully request that the status/scheduling conference be adjourned until after the Court has ruled on any motions to dismiss.

If Your Honor wishes to discuss this matter, we are available at the Court's convenience.

cc: Jamie A. Levitt, Esq.

Maite Aquino, Esq.

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